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**VIA ECF**

January 5, 2022

MEMORANDAM ENDORSED

Hon. Gabriel W. Gorenstein  
United States District Courthouse  
500 Pearl Street  
New York, NY 10007

**RE: *Jasmine Burgess, etc. v. Major Model Management, Inc., et ano***  
**Case No: 1:20-cv-02816 (GHW)**

Dear Judge Gorenstein:

Our firm represents the Defendants, Major Model Management, Inc. and Guido Dolci, in the above-referenced putative class action. This letter will serve as parties' joint application for an adjournment of the Settlement Conference, currently scheduled for January 13, 2022, to February 16, 2022 at 10:00 a.m.

The parties believe that an adjournment of the Settlement Conference will increase the likelihood of a resolution of this matter.

The Defendants received Plaintiff's settlement demand just before midnight on December 31, 2021. Under the terms of Your Honor's Standing Order Applicable to Telephonic Settlement Conferences, Defendants' response would have been due four (4) business days after receipt of Plaintiff's demand. The Plaintiff's demand requires an evaluation of a settlement on a class-wide basis. The Defendants (one of whom is an Italian citizen for whom English is a second language and for whom we are in the process of obtaining a simultaneous interpreter) required more than the time allotted to effectively evaluate a complex class-wide settlement, receive counsel's advice on the same and prepare a counter-offer consistent with the Defendants' interests and finances.

The additional time will also allow our firm (which only appeared in this matter mid-stream two months ago) more time to become familiar with the file and provide a more meaningful confidential settlement position to Your Honor and Plaintiff's counsel.

Based on the foregoing, the parties jointly request that the Settlement Conference be adjourned to February 16, 2022 at 10:00 a.m.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. D'Avanzo".

Joseph A. D'Avanzo

cc: Cyrus Dugger, Esq.  
Jordan Fletcher, Esq.  
Plaintiff's Counsel  
(via ECF)

Settlement conference adjourned to February 16, 2022 at 10:00 a.m. Submissions are due February 10, 2022.

So Ordered.

A handwritten signature in black ink, appearing to read "Gabriel W. Gorenstein".  
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GABRIEL W. GORENSTEIN  
United States Magistrate Judge

January 5, 2022